BEM
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2 November 1990

VIA FACSIMILE

John Banks
USEPA
Region III, 3HW23
841 Chestnut Building
Philadelphia, PA 19107

Reference: Old City of York Landfill

Dear Mr. Banks:

I am writing on behalf of the City of York, Alleco, Inc. (representing Macke) and Riteway Services (a Waste Management Company) (hereinafter the "Group") to discuss certain recent field activities conducted at the above-referenced site. In particular, I will address the monitoring well installation conducted on 15 and 16 October 1990 and the sediment sampling performed on 30 and 31 October 1990.

MONITORING WELL INSTALLTION

Monitoring wells F, 9 and 10 have been installed and developed. The 25 April 1990 work plan stated that the wells would be installed following the procedure set forth in the 17 April 1987 Revised Scope of Work for the City of York Landfill (SOW). In the course of the field work, two minor modifications to the procedures in the SOW took place and are discussed below.

- Screening of Drill Cuttings - The SOW stated that drill cuttings would be placed on plastic sheeting and screened with an OVA. An action level of of 5ppm was established in the SOW; drill cuttings exhibiting VOCs above this level would be sampled to determine

if they needed to be transported off site for disposal (if below 5 ppm, the cuttings would be left at the well site). During the drilling in October, the cuttings were not placed on sheeting and they were only indirectly screened with an OVA. As is commonly done during monitoring well installation, the cuttings were allowed to accumulate around the well casing during drilling. Although the cuttings themselves were not directly screened with an OVA during drilling, an OVA was used while drilling for health and safety air monitoring within the immediate drilling area. At no time during the drilling did the OVA register any detectable levels of VOCs. Based on wells previously installed at the site, including wells installed directly within the landfill, drill cuttings have consistently exhibited VOCs less than 5ppm and the same conditions were expected for these wells, especially since they are installed a substantial distance outside of the landfill. As a follow-up check, the cuttings were screened with an OVA on 19 October 1990, prior to developing the wells. No VOCs were detected.

- o Drilling Equipment Cleaning - The SOW stated that the drilling equipment would be steam cleaned between borings. Instead of steam cleaning the equipment, the equipment was washed with potable water between borings. Based on the nature of the compounds of concern in the groundwater (VOCs) and their low concentration, this method of cleaning is appropriate. Following the completion of drilling at each location, the drill rods were left in the boring and preliminary well development was performed by jetting air down the drill stem. The agitating action caused by this process removed any soil or cuttings that may have been adhered to the drill bit or rods as a result of the borehole drilling. The rods were then removed from the boring and placed on the drill rig carousel and hose-washed with potable water. Between the washing procedure and the natural aeration which occurs while moving between drilling locations, cross contamination between wells would not occur.

I have previously discussed the above modifications with both you and Jay Newbaker. I understand that EPA's position is that these modifications were not substantial and that the

results generated by any future testing of the wells would be acceptable to EPA.

SEDIMENT SAMPLING

The additional sediment sampling, proposed in your 6 August 1990 letter to me and further clarified and agreed to by the Group in my 23 August 1990 response letter to you, has been completed in accordance with said letters. All sampling locations and analytical methods were approved in the field on 30 October 1990 by Bob Davis (EPA biologist) Cindy Rice (US Fish and Wildlife, acting as the designated trustee for natural resources) and yourself. During your site visit on 30 October 1990, Groundwater Technology, Inc. (GTI) personnel Cathy Collins and Andy Thomas showed you, Bob and Cindy two additional areas of interest: a small area of ponded water located near the beginning of the flood plain of Codorus Creek, near the northern run-off stream; and a low flowing, orange-colored discharge along the bank of Codorus Creek a short distance downstream of the confluence of Codorus Creek with the southern run-off stream. The nature of these discharges is unknown (i.e. whether they are resulting from the landfill or are the product of a natural groundwater discharge containing high iron levels). I became aware of these areas during my site visit on 29 October 1990 and subsequently informed the Group. The Group instructed GTI to show these locations to EPA and the US Fish and Wildlife and to discuss appropriate sampling of these areas with the agencies.

As recommended by EPA and the US Fish and Wildlife, the Group has agreed to sample the sediment at each of these locations. The sediment at the ponded water area will be analyzed for TAL metals, and the sediment on the bank of Codorus Creek, directly below the orange colored discharge, will be analyzed for complete TCL/TAL analysis. We understand that the agencies will evaluate the analytical results from these two new areas using the same criteria by which the other sediment samples will be evaluated (as discussed in my 23 August 1990 letter to you): namely, 1) assuming comparable data from this round of sampling, no further sediment or surface water sampling is expected, and 2) chronic bioassays will be performed if and only if constituents are detected at "levels that may pose a threat to aquatic life".

OTHER ITEMS

I would also like to confirm our discussion regarding field parameters measurements during the 29 and 30 October 1990 sediment sampling program. Due to some unexpected problems in obtaining the necessary equipment to perform the field parameter measurements for Eh, pH and specific conductance, EPA has granted permission for the Group to have these parameters measured by the laboratory (Versar) and furthermore, EPA will allow the resulting data to be used in place of actual field measurements.

On a final note, as we discussed, discrete zone permeability testing (Sections 2.3 and 2.4 of the 25 April 1990 Work Plan) will be conducted on 5 and 6 November 1990, and ground water sampling (Section 2.5 of the 25 April 1990 Work Plan) will be conducted from 12 November 1990 until about 21 November 1990.

Please confirm in writing at your earliest convenience that EPA, PADER and the US Fish and Wildlife agree with the content of this letter. The Group desires to know that such agreement exists before proceeding with any additional field work.

If you have any questions, please do not hesitate to call me at (615 691-5051).

Respectfully,

Rodney Sutch

Rodney Sutch
de maximis, inc.

RS/mdm

cc: R. Bishop
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